

**FILED**  
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U.S. DISTRICT COURT E.D.N.Y.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

★ AUG 03 2006

LONG ISLAND OFFICE

U.S. PHILIPS CORPORATION,  
a Delaware corporation,  
Plaintiff/Counterclaim Defendant,

v.

ZWT, INC., a New Jersey corporation, and  
HARMINDER BHASIN, RAMEET BHASIN,  
GURVINDER BINDRA, JOHN IANNOTTI,  
and ASIF JAMAL, individuals,  
Defendants/Counterclaim Plaintiffs.

Civil Action No. CV 05-3892 (TCP)(ARL)

**STIPULATED FINAL CONSENT  
JUDGMENT ORDER**

Plaintiff/Counterclaim Defendant U.S. Philips Corporation ("Plaintiff") and  
Defendants/Counterclaim Plaintiffs ZWT, Inc. ("ZWT"), Harminder Bhasin, Rameet  
Bhasin, Gurvinder Bindra, John Iannotti, and Asif Jamal (collectively, "Defendants"),  
through their attorneys, stipulate and agree that, and it is Ordered that:

1. Pursuant to Fed. R. Civ. P. 54(b), this Court enters this Stipulated Final Consent Judgment.
2. Without admitting or denying liability, upon entry of this Stipulated Final Consent Judgment Order, Defendants, all successors and assigns of ZWT, their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise, are hereby enjoined and restrained from, directly or indirectly:
  - (a) making, replicating, selling, offering for sale, importing, advertising, promoting, marketing, or otherwise disposing of DVD discs that meet

the industry standards for DVD discs anywhere in the United States or its territories, during the respective terms of U.S. Patent Nos. 5,745,641 and 5,790,512 ("the '641 and '512 Patents"), without express license or other authority from Plaintiff; provided, however, that nothing in this paragraph shall enjoin or restrain any such persons or entities from selling, offering for sale, importing, advertising, promoting, marketing, or otherwise disposing of DVD discs that have been manufactured by entities licensed by Plaintiff;

(b) inducing or contributing to the infringement of any claims of the '641 and '512 Patents with such DVD discs; and

(c) effecting assignments or transfers, forming new entities or associations, or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (a)-(b), above.

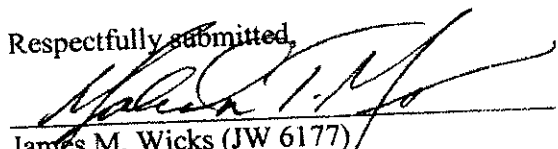
3. Pursuant to Fed. R. Civ. P. 41(a)(1)(ii), Defendants dismiss with prejudice their counterclaims against Plaintiff.

4. All parties waive any right to any further relief in connection with the complaint or counterclaims.

SO STIPULATED:

Dated: 8/3/06, 2006

Respectfully submitted,

  
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Patrick T. Collins (PC 8093)  
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Attorneys for Plaintiff/Counterclaim Defendant  
U.S. PHILIPS CORPORATION

Dated: July 31, 2006

Respectfully submitted,



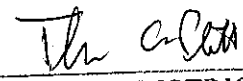
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-and-

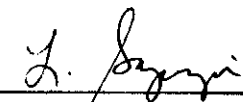
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Attorneys for Defendants/Counterclaimants  
ZWT, INC., HARMINDER BHASIN, RAMEET  
BHASIN, GURVINDER BINDRA, JOHN  
IANNOTTI, AND ASIF JAMAL

SO ORDERED, this 9<sup>th</sup> day of August, 2006.

  
UNITED STATES DISTRICT JUDGE

**Judgment Entered.**

  
**Robert C. Heinemann, Clerk**  
USDC/EDNY DATE: 8/25/06



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August 4, 2006

**By ECF and OVERNIGHT MAIL**

Honorable Thomas C. Platt  
United States District Court  
Eastern District of New York  
Long Island Federal Courthouse  
814 Federal Plaza  
Central Islip, New York 11722-4451

Re: Philips v. ZWT et al., No. CV 05-3892 (TCP)(ARL) (E.D.N.Y.)

Dear Judge Platt:

This firm is co-counsel for Plaintiff U.S. Philips Corporation ("Philips") in the above-referenced patent infringement civil action.

The parties have entered into a proposed Stipulated Final Consent Judgment Order. If approved by the Court, the proposed Stipulated Final Consent Judgment Order would constitute a final disposition of this action. We respectfully request the Court to enter the proposed Stipulated Final Consent Judgment Order submitted herewith.

Respectfully submitted,

/s/ Patrick Collins  
Patrick Collins (PC 8093)  
FARRELL, FRITZ, P.C.  
1320 Reckson Plaza  
Uniondale, NY 11556-1320

cc: John D. D'Ercole, Esq. (by ECF and facsimile)  
J. Ted Donovan, Esq. (by ECF and facsimile)